

Application No.: 10/085,530
Group Art Unit: 2143

Docket No.: SMQ-085 (P6383)

REMARKS

Applicants amend claims 1, 2, 4, 6, 7, 9, 10, 13, and 22 to clarify the claimed invention. Claim 8 is canceled. Hence, claims 1-7 and 9-24 are pending, of which claims 1, 6, 10, 18, 21, 22, 23, and 24 are independent. Applicants respectfully submit that the pending claims define over the art of record.

The Claimed Invention

The claimed invention provides a method and system that allows a user to dynamically add their own CLI commands. A server uses a CLI session tool to manage a list of CLI commands, including pre-defined commands and the user-defined commands. User-defined commands originate from a client/user whereas pre-defined commands originate from a server. New user-defined commands can be added to the CLI session tool and the server will notify all clients of the new commands so that a developer does not need to separately update all of the clients whenever a new command is added.

Claims 6, 10-12, 14-17, and 23

Claims 6, 10-12, 14-17, and 23 are rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent No. 6,141,660 to Bach et al. (hereafter "Bach") in view of United States Patent No. 5,754,841 to Carino, Jr. (hereafter "Carino").

Claim 6

Claim 6 is amended to recite the step of sending an update file containing at least one user-defined CLI command to the server. Applicants respectfully submit that the combination of Bach and Carino does not teach or suggest this limitation.

Bach teaches that a client computer 100 including a GUI or CLI to interact with a Class Definition Tool (CDT) 400 which also resides on the client computer 100. See Fig. 4, and Col 10, lines 30-35. CDT generates object-oriented code to access the database 112. See Col. 10, lines 36-40. Hence, Bach does not teach or suggest the use of CLI between a server and client. Bach merely teaches that CLI as one of the interface that can be used to interface with CDT. Furthermore, Bach wants to minimize the need to write non-object-oriented code to access the

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database (See Col. 10, lines 37-38), hence Bach teaches away from the claimed invention of using CLI. Accordingly, Bach does not teach or suggest the step of sending an update file containing at least one user-defined CLI command to the server, as required by claim 6.

Carino fails to cure the deficiency of the Bach reference. Carino teaches a method for processing object data in a database management system. However, nowhere does the Carino reference teach or suggest the step of sending an update file containing at least one user-defined CLI command to the server, as required by claim 6.

Accordingly, Applicants respectfully submit that the combination of the Bach reference and the Carino reference do not teach or suggest claim 6. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 6.

Claims 10-12, 14-17, and 23

As set forth above, Bach does not teach or suggest the use of CLI between a server and client. Furthermore, Bach *teaches away* from the claimed invention of using CLI commands, because Bach wants to minimize the need to write non-object-oriented code to access the database. See Col. 10, lines 37-38. Accordingly, Bach does not teach or suggest any of the steps of independent claims 10 and 23.

Carino fails to cure the deficiency of the Bach reference. The Examiner notes that Carino teaches the step of mapping the request to an instance of an object class at Col. 4, lines 16-59. However, in the cited section, Carino merely teaches that a client 220 can send CLI commands to a federated coordinator 206. Carino does not teach or suggest *mapping* a request to an instance of an object class, as required by claim 10 and 23. Furthermore, the Carino reference also does not teach or suggest the instruction of the construction of an outgoing user interface by the object instance.

Accordingly, the combination of Bach and Carino does not teach or suggest each and every limitation of independent claims 10 and 23. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 10 and 23 and the corresponding dependent claims 11-12 and 14-17.

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Claims 1-5, 7-9, 13, 18-22, and 24

Claims 1-5, 7-9, 13, 18-22, and 24 are rejected under 35 U.S.C. §103(a) as being unpatentable over Bach and United States Patent No. 6,625,590 to Chen et al. (hereafter "Chen") further in view of Carino. Claim 8 is canceled hence the rejection is moot.

Claims 1-5, 7-9, and 22

Independent claims 1, 6, and 22 recite the limitation of at least one update from the client containing at least one user-defined CLI command. Applicants respectfully submit that the combination of the Bach, Chen, and Carino do not teach or suggest this step.

Bach discloses a method for generating class specifications for an object-oriented application that accesses a database. Nowhere in the Bach reference does it teach or suggest the limitation of at least one update from the client containing at least one user-defined CLI command, as required by independent claims 1, 6, and 22. Furthermore, Bach wants to minimize the need to write non-object-oriented code to access the database (See Col. 10, lines 37-38), hence Bach teaches away from the claimed invention of using CLI.

Carino discloses a method for processing object data in a database management system. Nowhere in the Carino reference does it teach or suggest the limitation of at least one update from the client containing at least one user-defined CLI command, as required by independent claims 1, 6, and 22.

Chen discloses a Unified Command Interface (UCI) that can be utilized to create, update, retrieve, and store network management information in network devices. Although Chen discloses that new UCI commands can be created, however Chen merely means that a command can be created using pre-defined commands by using the *cut and paste* feature in the UCI interface, so that the number of keystrokes can be reduced. Hence after the UCI interface outputs a list of valid command inputs, a user can use the cut and paste feature to cut and paste the desired command input without typing the entire command character by character. See Col. 7 lines 33-41. Therefore, the Chen reference merely teaches creating commands from pre-defined

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commands and not user-defined commands. Applicants respectfully submit that the Chen reference does not teach or suggest the limitation of at least one update from the client containing at least one user-defined CLI command, as required by independent claims 1, 6, and 22.

Accordingly, the combination of Bach, Carino, and Chen do not teach or suggest the limitation of at least one update from the client containing at least one user-defined CLI command, as required by claims 1, 6, and 22. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1, 6, and 22.

Applicants note that the dependent claims also recite separate patentable subject matter. For example, claim 4 recites the step of downloading the at least one update file containing the at least one user-defined CLI command to a second client. Applicants respectfully submit that the combination of Bach, Carino, and Chen does not teach or suggest that one client sending a server an update file and another client downloading the same update file. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 2-5, 7, and 9.

Claims 18-20 and 24

Independent claims 18 and 24 recite the limitation of the command line interface client utilizes at least one of commands originating at the client and commands originating at the server. Applicants respectfully submit that the combination of Bach, Carino, and Chen do not teach or suggest this limitation.

Commands originate at the client are user-defined commands. Without characterizing the Examiner's analysis of the Bach and Carino reference, the Examiner notes that Chen teaches that at least one of commands originating at the client at Col. 7, lines 25-42 and Col. 9, lines 2-27. Applicants respectfully disagree. In the cited section of Chen, Chen merely discloses that commands can be created from pre-defined commands and not user-defined commands. Hence, at best, Chen only teaches commands originating at the server, and not commands originating at the client.

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Accordingly, Applicants respectfully submit that the combination of the Bach, Carino, and the Chen references do not teach or suggest the limitation of the command line interface client utilizes at least one of commands originating at the client, as required by independent claims 18 and 24. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 18 and 24 and their dependent claims 19-20.

Claim 21

Claim 21 recites the limitation that the interface tool enables a client to add new interface commands to the interface tool. Applicants respectfully submit that the combination of the Bach, Carino, and the Chen references fail to teach this limitation.

Without characterizing the Examiner's analysis of the Bach and Carino references, the Examiner notes that Chen teaches the limitation that the interface tool enables a client to add new interface commands to the interface tool at Col. 8, lines 5-61. Applicants respectfully disagree.

The cited section in Chen teaches that UCI commands can be passed between network devices using either TCP/IP or TFTP (Telnet File Transport Protocol). Network devices that receive the UCI commands execute the commands upon receipt. However, nowhere in the cited section or anywhere in Chen does it teach or suggest that new commands interface commands can be added by a client to an interface tool, as required by independent claim 21. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of independent claim 21.

Claim 13

Claim 13 depends on claim 10. As set forth above, the combination of Bach and Carino do not teach or suggest each and every element and limitation of claim 10. Applicants further submit that Chen does not cure the deficiency of Bach and Carino.

The Examiner takes official notice that it is well known that a controller servlet is used to map a request from a CLI client to an instance of an object class. Applicants respectfully disagree. As set forth above, Bach does not teach or suggest any use of CLI between a client and

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a server and Bach further teaches away from the use of CLI commands. Carino also does not teach or suggest mapping of a request to an instance of an object class. The Examiner does not show how the Chen reference applies to claim 13. Accordingly, Applicants respectfully submit that it is not obvious that a controller servlet or anything is used to map a request to an instance of an object. Applicants respectfully request that the Examiner provide support for the official notice. See MPEP 2144.03.

Accordingly, Applicants respectfully submit that the combination of Bach, Carino, and Chen do not teach or suggest claim 13. Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 13.

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CONCLUSION

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Applicants believe no fee is due with this statement. However, if a fee is due, please charge our Deposit Account No. 12-0080, under Order No. SMQ-085 from which the undersigned is authorized to draw.

Dated: December 22, 2005

Respectfully submitted,

By Kevin J. Canning
Kevin J. Canning
Registration No.: 35,470
LAHIVE & COCKFIELD, LLP
28 State Street
Boston, Massachusetts 02109
(617) 227-7400
(617) 742-4214 (Fax)
Attorney For Applicant